

UNITED STATES DISTRICT COURT

JUN 04 2016

for the

Southern District of Texas

Clerk of Court

United States of America

v.

Timinson Erin JACKSON

USC; YOB: 1991

Case No.

M-16-1081-M

Related: M-16-1082-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 3, 2016 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section


18 U.S.C. 2422(b)

Offense Description

Knowingly enticing and coercing an individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity

This criminal complaint is based on these facts:

See the attached Affidavit

☒ Continued on the attached sheet.

Complainant's signature

Christopher Sullins, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/04/2016City and state: McAllen, Texas

Judge's signature

Dorina Ramos, U.S. Magistrate

Printed name and title

Attachment "A"

On May 25, 2016, Homeland Security Investigations Special Agent Christopher Sullins (hereinafter referred to as "SA Sullins") participated in an undercover online solicitation investigation on Craigslist.com. SA Sullins created and posted an advertisement under the casual encounters portion of their website. The advertisement title stated, "home from school today, bored af". This advertisement was posted in the section "w4m" defined as women seeking men". Later on that date, SA Sullins received a response in his undercover email account from an individual known as "Andrew" (later identified as Timinson Erin JACKSON). Using an undercover email and phone number, Special Agent Sullins began conversations with the defendant representing himself to be a 12-year-old female child named "Carmen." SA Sullins communicated with JACKSON for several days.

JACKSON sent text messages indicating a desire to meet "Carmen" and a desire to have sex with "Carmen." JACKSON sent several text messages of a sexual nature including, "[w]ant me to send you a pic of my candy stick lol I think you would like it" which SA Sullins perceived as referencing to JACKSON's penis. Further, after "Carmen" messaged that she was going to wear a bikini at the pool, JACKSON complimented her on how sexy she was going to look and stated "not going to lie I feel kind of horny thinking about it lol now I really cant wait till tomorrow."

JACKSON also sent several messages indicating a desire to commit sexual acts with the 12 year old girl. JACKSON messaged, "[w]ell I go pick u up bring you to my place put whatever you want to watch on Netflix you sit on my lap on my big recliner I hold you in my arms you move your hips around slowly and we let it take its course and have fun." In regards to her being 12 years old, JACKSON messaged, "I haven't been with someone as young as you and sounds like fun I get hard thinking about it." JACKSON messaged "[w]ell after I pick you up and bring you to my place we can chill for awhile and get to know one another more or we can go straight to having some nice sex and chill after that and do it as many times as you feel up for I am pretty much up to do anything you want".

On June 3, 2016, JACKSON arranged to meet the female child "Carmen" for sex. JACKSON drove to the park where the female child "CARMEN" stated that she was going to be at.

At approximately 11:52am, JACKSON texted that he arrived at the location. At approximately 12:00pm, JACKSON was apprehended by HSI McAllen Special Agents. Upon a search of his vehicle, agents found several condoms.

JACKSON was subsequently interviewed by HSI McAllen Special Agents. JACKSON was provided with his constitutional rights, stated he understood them, signed a rights waiver form, and agreed to an interview. JACKSON stated he was aware that "Carmen", the girl he was communicating with, was 12 years old. JACKSON further admitted that he was going to the park to meet her in order for them to have sex. If JACKSON had sex with a 12 year old child, he could have been charged with aggravated sexual assault in violation of the Texas Penal Code 22.021.